

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:	§	Chapter 11
	§	
	§	CASE NO. 24-11967(JKS)
BIG LOTS, INC., et al	§	
Debtors.	§	Jointly Administered

**WITHDRAWAL OF LEASE SALE AND ADEQUATE ASSURANCE OBJECTION OF
GRATIOT, LLC RELATING TO DEBTOR’S STORE LOCATED AT GRATIOT
SHOPPING CENTER IN CHESTERFIELD MI**

Creditor and landlord Gratiot, LLC (sometimes “Gratiot” or “Landlord”), by and through its undersigned counsel, files this Withdrawal of Lease Sale and Adequate Assurance Objection of Gratiot, LLC Relating to Debtor’s Store Located at Gratiot Shopping Center in Chesterfield MI (“Objection”), and respectfully states:

1. Based upon representations from Debtors counsel Debtor’s Store Located at Gratiot Shopping Center in Chesterfield MI is not subject to any listing for sale or rejection yet.
2. Accordingly, based upon representations from Debtors counsel Gratiot hereby withdraws its objection filed under docket number 279 with the reservation of rights to reassert this objection should the need arise in the future.

Reservation Of Rights

3. Landlord reserves its rights to make such other and further objections with respect to the Big Lots Gratiot Lease as may be appropriate including, but not limited to, objections regarding adequate assurances of future performance under 11 U.S.C. §365.

4. The Landlord reserves its rights to supplement this withdrawal and make such other and further objections as it deems necessary or appropriate in the future.

WHEREFORE, the Landlord Gratiot, LLC respectfully withdraws its September 25, 2024 objection with the reservation of rights to reassert this objection should the need arise in the future and that the Court grant the Landlord, Gratiot, LLC, such further and additional relief as the Court may deem just and proper.

**Respectfully submitted,
RASHTI AND MITCHELL
ATTORNEYS AT LAW**

/s/ Timothy T. Mitchell
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CERTIFICATE OF SERVICE

I Timothy T. Mitchell do hereby certify that a true and correct copy of the above Withdrawal of Lease Sale and Adequate Assurance Objection of Gratiot, LLC Relating to Debtor's Store Located at Gratiot Shopping Center in Chesterfield MI has been served upon the parties listed on the Court's ECF transmission list in this case via ECF e-notice, fax or U.S. mail, on this 25th day of September, 2024.

/s/ Timothy T. Mitchell
Timothy T. Mitchell
Texas State Bar Number 14223000
Attorneys for Gratiot, LLC